



225 Winter st

Hopkinton MA 01748

Ms. Marlene Dortch

Federal Communications Commissions

445 Twelfth Street, SW

Washington, DC 20554

Dear Ms. Dortch:

On November 8, 2017, Terry Leahy – Managing Partner of HubCap LLC and Ed Rose – Managing Partner of HubCap met with Karen Peltz Srauss, Eliot Greenwald, Michael Scott and Robert McConnell of the Commissions Consumer and Government Affairs Bureau and Andrew Mulitz and David Schmidt of the Office of the Managing Director.

The purpose of the meeting was to present the Business Plan for HubCap – and discuss our intention to create a Standard technology platform enabling an open API/Microservice to enable any user to create “FCC compliant captioning” that reflects the current requirements of the IP CTS program and beyond. The publicly-available API and service will allow secure integration with any phone and internet-enabled device with dramatically reduced cost, a modernized customer experience and a standard methodology for measuring transaction activity, quality of service and continuous improvement.

HubCap is a consortium business model which will be owned and operated by all founding members. (stakeholders in the IP CTS service delivery model). Invited stakeholders will include organizations that advocate for the Deaf and Hearing Loss Community, Older Adults, current IP CTS providers, and new Device and Software providers that wish to provide captioning.

As discussed, the availability of microservices/cloud based technology and state-of-art ASR capability now make these economic and quality breakthroughs a reality. We are also assembling an Advisory Council that will include representation from industry experts, the various advocacy groups which, together with founding members in HubCap will guide a unified technology roadmap and program management governance.

There are many examples of standards based business models enabling innovation cycles in many industries. As discussed – we believe the IP CTS channel will benefit enormously from the kind of technology advances that have occurred in the telephony, cloud and speech spaces. It is our goal to demonstrate a strong alignment of interests in the current vendor base to participate and benefit from

the improved economics of this inevitable transition. As we commence our discussion of the business case among these stakeholders we will keep you abreast of our progress and look forward to your feedback and input.

We also attach our presentation materials from yesterday as well. Thank you again for your useful feedback and active participation in the meeting.

Ed and Terry